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Attorneys for Defendant American Export Lines
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

OLABISI SALIS

Plaintiff,

- against -

AMERICAN EXPORT LINES; HOEGH
AUTOLINERS, INC.

Defendants.

Civil Number:

**PETITION FOR REMOVAL PURSUANT TO
28 U.S.C. §§ 1446 and 1337**

Defendant American Export Lines (hereinafter "AEL") hereby petitions this Court pursuant to 28 U.S.C. §§1446 and 1337 to remove to this Court the above-captioned civil action now pending in the Civil Court of the State of New York, County of New York, and further represent as follows:

1. Defendant/Petitioner AEL is a defendant in the civil action now pending in the Civil Court of the State of New York, County of New York Index number 024898/2007. No trial has yet been had therein. Copies of pleadings served upon or by defendant/petitioner in this action are attached hereto.

2. Civil Court of the State of New York Index number 024898/2007 is one which may be removed pursuant to 28 U.S.C. §1337 in that the matter concerns a civil action or

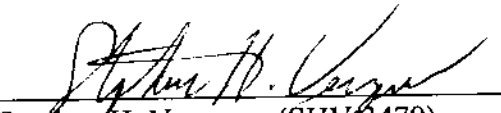
proceeding arising under an Act of Congress regulating commerce, including, the Harter Act, 46 USC App §§ 190-195; Carriage of Goods by Sea Act 46 USC App §§1302-1313 (2006) and the liability of carriers under receipts and bills of lading at 49 U.S.C. §14706.

3. Attorney for defendant Hoegh Autoliners, Inc. has consented to AEL's removal petition.

WHEREFORE, this action now pending in the Civil Court of New York, County of New York, index number 024898/2007, is properly removed pursuant to 28 U.S.C. §§ 1446 and 1337.

Dated: June 22, 2007

CICHANOWICZ, CALLAN, KEANE,
VENGROW & TEXTOR, LLP
Attorneys for Defendant American Export Lines

By: 
Stephen H. Vengrow (SHV/3479)
61 Broadway, Suite 3000
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To: Salis & Associates, P.C.
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New York, New York 10004
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111 Broadway, Floor 10
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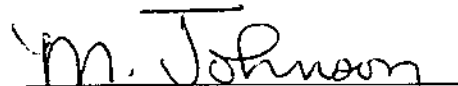
CERTIFICATE OF SERVICE BY REGULAR U.S. MAIL

The undersigned declares under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen years and I am not a party to this action.
2. On June 22, 2007, I served a complete copy of **Defendant American Export Lines' Petition For Removal Pursuant to 28 U.S.C. §§ 1446 and 1337** by ECF to the following attorneys by regular U.S. mail at the following addresses:

TO: Salis & Associates, P.C.
42 Broadway, Room 1133
New York, New York 10007-2801
(212) 655-5749

Mahoney & Keane
111 Broadway, Floor 10
New York, New York 10006
(212) 385-1422


Maria Johnson

DATED: June 22, 2007
New York, New York